

October 9, 2001

Mr. James Roark  
Rieter Automotive North America, Inc.  
101 West Oakley Avenue  
Lowell, Indiana 46356

Re: 089-14776  
Fourth Administrative Amendment to  
Part 70 089-6629-00013

Dear Mr. Roark:

Rieter Automotive North America, Inc. was issued a permit on June 16, 1999 for a stationary automotive sound deadening products manufacturing plant. A letter requesting to relocate one reverse roll coater and one laminator from the line 2 operation to the hot mold department was received on June 16, 2001. Both these units use non-VOC containing raw material and have no associated emissions. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
  - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
  - (B) Thirteen (13) cooling bucks,
  - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and
  - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
  - (E) **One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and**
  - (F) **One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.**
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
  - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.

- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven, identified as FCU-15.
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
  - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.
- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
  - (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
  - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
  - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
  - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10,
  - ~~(E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and~~
  - ~~(F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.~~

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
  - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
  - (B) Thirteen (13) cooling bucks,
  - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and
  - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
  - (E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and**
  - (F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.**
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
  - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15, and
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
  - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
  - (B) One (1) coater #1 using flexcrl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcrl per hour,
  - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
  - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10,
  - ~~(E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and~~
  - ~~(F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
ERG/MP

cc: File - Lake County  
U.S. EPA, Region V  
Lake County Health Department  
Northwest Regional Office  
Air Compliance Section Inspector – Ramesh Tejuja  
Compliance Data Section – Joe Foyst  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Rieter Automotive North America, Inc.  
101 West Oakley Avenue  
Lowell, Indiana 46356-2206**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 16, 1999
1 <sup>st</sup> Administrative Amendment 089-11497 2 <sup>nd</sup> Administrative Amendment 089-12125 1 <sup>st</sup> Minor Permit Modification 089-12506 3 <sup>rd</sup> Administrative Amendment 089-12693	Issuance Date: November 24, 1999 Issuance Date: April 14, 2000 Issuance Date: September 26, 2000 Issuance Date: October 17, 2000
4 <sup>th</sup> Administrative Amendment 089-14776	Pages Amended: 6, 6a, 7, 31,31a, 33
Issued by: Original signed by  Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 09, 2001

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary automotive sound deadening products manufacturing operation.

Responsible Official: Jeff Windlow  
Source Address: 101 West Oakley Street, Lowell, Indiana 46356-2206  
Mailing Address: 101 West Oakley Street, Lowell, Indiana 46356-2206  
Phone Number: 219-696-5100  
SIC Code: 3714  
County Location: Lake  
County Status: Severe Nonattainment Area for Ozone  
Attainment for all other Criteria Pollutants  
Source Status: Part 70 Permit Program  
Major Source under PSD Rules;  
Major Source under Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
  - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
  - (B) Thirteen (13) cooling bucks,
  - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and
  - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
  - (E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and
  - (F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to

two (2) stacks (FP-1 and FP-2), consisting of the following equipment:

- (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven,

identified as FCU-15.

- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
  - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.
- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
  - (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
  - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
  - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
  - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10,
- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
  - (A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
  - (B) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6
  - (C) One (1) bag dump station with baghouse BH-12,
  - (D) Nine (9) pneumatically loaded silos (#9 - #17), with a combined capacity of 46,945 pounds per hour,
  - (E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6
  - (F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11
  - (G) Two (2) reverse roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7
  - (H) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.
- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
  - (A) Two (2) bag dump stations:
    - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
    - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
  - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
  - (B) Thirteen (13) cooling bucks, and
  - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units.
  - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
  - (E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and
  - (F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
  - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15, and
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
  - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
  - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations):

- (A) The PM from the one (1) hot molding department shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2, HETT-3/HV-1	70,467	0.03	18.12
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2, HETT-3/ HV-1	22,076	0.03	5.67
HMP-8, HMP-9 / HV-3	54,083	0.03	13.90

- (B) The PM from the one (1) foam part line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
  - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
  - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
  - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the PM from Line 2 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 2 Asphalt Saturator / SV-1	2,760	0.03	0.70

#### D.2.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Line 2 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

#### D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), no owner or operator of a facility engaged in the surface coating of fabric or vinyl may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to coating applicator when coating fabric and 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating vinyl.